Michael Fuller, OSB No. 09357

OlsenDaines US Bancorp Tower 111 SW 5th Ave., Suite 3150 Portland, Oregon 97204 michael@underdoglawyer.com Direct 503-222-2000

Of Attorneys for Plaintiff

 $\mathbf{v}\mathbf{s}$

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

MATTHEW SPONER Case No. 3:17-cv-2035-HZ

Plaintiff PLAINTIFF'S MOTION TO

STAY THE DEADLINE TO FILE A COST BILL AND

MOTION FOR ATTORNEY

WELLS FARGO BANK N.A. FEES

Defendant **EXPEDITED**

CONSIDERATION

REQUESTED

LR 7-1 CERTIFICATION

The parties made a good faith effort by telephone to resolve this motion and were unable to resolve the issue. Wells Fargo opposes the motion but does not oppose expedited consideration.

MOTION TO STAY

Plaintiff intends to file a motion for new trial by October 24, 2019, which, if granted, would moot the need for the parties and the Court to expend time and resources preparing, filing, and deciding the cost bill and motion for attorney fees currently due October 10, 2019.

Under this Court's inherent authority plaintiff respectfully requests an order staying the deadline to file a cost bill and motion for attorney fees until after the Court rules on the forthcoming motion for new trial.

September 27, 2019

RESPECTFULLY FILED,

s/ Michael Fuller
Michael Fuller, OSB No. 09357
Of Attorneys for Plaintiff
OlsenDaines
US Bancorp Tower
111 SW 5th Ave., Suite 3150
Portland, Oregon 97204
michael@underdoglawyer.com
Direct 503-222-2000

CERTIFICATE OF SERVICE

I certify that on the date below, I caused this document and all attachments to be served on the parties to this action via ECF.

September 27, 2019

s/ Michael Fuller
Michael Fuller, OSB No. 09357
Of Attorneys for Plaintiff
OlsenDaines
US Bancorp Tower
111 SW 5th Ave., Suite 3150
Portland, Oregon 97204
michael@underdoglawyer.com

Direct 503-222-2000